

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

FILED
CLERK'S OFFICE

CIVIL ACTION DOCKET NO. 04 CV 12316 WGY

JAN 11 2005 P 1:55

KEVIN P. LOUGHMAN,
A Citizen of the Commonwealth of Massachusetts,
Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF MASS.

vs.

MAURA MAHONEY,
A Citizen of the State of Florida
In Her Capacity as
Security Services Manager,
Lotus Development Corporation
and

MAURA FEELEY,
A Citizen of the Commonwealth of Massachusetts
In Her Capacity as
Assistant District Manager,
First Security Services Corporation
and

LOTUS DEVELOPMENT CORPORATION,
A SUBSIDIARY OF IBM CORPORATION,
Armonk & White Plains, New York
and

FIRST SECURITY SERVICES CORPORATION,
A SUBSIDIARY OF PINKERTON'S/U. S. A., Inc.,
Westlake Village, California

Defendants

PLAINTIFF'S MOTION 2 TO RE-OPEN CASE, FOLLOWING
UPON HIS RECOVERY FROM OPEN-HEART SURGERY

By and For the Plaintiff, Pro-Se
Kevin P. Loughman

4 Marrigan St., Arlington, Massachusetts, 02474

Telephone: 781-641-2756

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To the Clerk of the Above Named Court:

The Plaintiff, Kevin P. Loughman, in the above action, HEREBY Motions that the order for CLOSURE previously filed with the Court by Opposing Counselors Jean Musiker and Shireen Argani and ALLOWED, by Young, C. J. on 12/22/04 should be lifted or removed, effective January 7, 2005.

As reason wherefore, the Plaintiff, Pro-Se avers to the Court that he has survived Open Heart Surgery for the replacement of his Aortic Valve and one of his Coronary Arteries. This surgery was accomplished at the Heart Hospital in London, U.K. on December 10th and December 16th, 2004. Repatriation back to the United States and short-term recovery and convalescence are now nearing completion.

The Plaintiff's primary care physician has cleared the Plaintiff to return to work, commencing on January 17, 2005.

Having recovered from this surgery, and his post-operative condition now having become stabilized, the Plaintiff, Pro-Se, is now anxious to move ahead to conclusion of this lawsuit, currently filed with the United States District Court for Eastern Massachusetts.

Respectfully submitted to this Honorable Court,
Signed under the Pains and Penalties of Perjury.



By and For Kevin P. Loughman, Plaintiff, Pro-Se

4 Marrigan Street, Arlington, MA, 02474

Telephone: 781-641-2756

January 7, 2004

CERTIFICATE OF SERVICE

TO THE CLERK OF the UNITED STATES DISTRICT COURT
FOR MASSACHUSETTS, ESTERN DIIIVISION:

I, Kevin P. Loughman, Plaintiff, Pro-Se in the
above action, hereby certify that I served one
copy of my Motion #2 to RE-OPEN THE CASE, upon:

Defendant Maura Feeley and Defendant First
Security Services Corporation: In care of
Designated Legal Counsel, Atty. Jean Musiker,
Sugarman, Rogers, Barshak & Cohen, 101 Merrimac
St., Boston, MA 02114. Service was via pre-paid,
first-class U.S. Mail. Mailing: January 7, 2005.

Defendant Maura Mahoney and Defendant Lotus
Development Corporation. In care of designated
Legal Counsel, David Wilson, at Robinson & Cole,
LLP, One Boston Place, Boston, MA 02108-4404.
Service was via pre-paid, first-class U.S. Mail,
Date of mailing: January 7, 2004.

Respectfully submitted to this Honorable Court,
Signed under the Pains and Penalties of Perjury



By and For Kevin P. Loughman, Plaintiff, Pro-Se

4 Marrigan Street, Arlington, MA, 02474

Telephone: 781-641-2756

January 7, 2005